



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Natural Resources

DIVISION OF MINING, LAND & WATER  
Mining Section  
Northern Office

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June 20, 2022

Garfield MacVeigh  
Member Representative  
Constantine Mining, LLC  
800 West Pender Street, Ste 320  
Vancouver, British Columbia,  
V6C 2V6 Canada

**Subject: Palmer Exploration Phase II Reclamation Plan Approval J20185690RPA.1  
Request to Phase Financial Assurance**

Dear Mr. MacVeigh:

On June 13, 2022, the Division of Mining, Land, and Water (DMLW) received correspondence from Constantine Mining, LLC (Constantine) requesting to phase in the financial assurance approved under the recently modified Reclamation Plan Approval issued on May 13, 2022. This proposal would have Constantine provide an initial financial assurance in the amount of \$392,000.00 for the existing disturbance and the proposed disturbance for the 2022 mining season. Prior to the construction of the 2023 season, Constantine would further amend the financial assurance to the full amount of the approved Cost Estimate.

The DMLW Mining Section has reviewed and consulted with the Alaska Department of Environmental Conservation (ADEC) on the proposed phasing of the financial assurance. Under 11 AAC 97.415(a) (Acreage to be bonded), the acreage that must be bonded prior to mining operations are limited to the area that is to be mined during the calendar year and any previously mined area that has yet to be reclaimed. The DMLW Mining Section therefore concurs with Constantine's proposal to provide an initial financial assurance in the amount of \$392,000.00 for the 2022 mining season with the intent of increasing the financial assurance for the 2023 mining season to reflect the complete cost estimate as approved.

The DMLW Mining Section's approval of the Reclamation Plan submitted by Constantine also serves as concurrence that surface uses of General State lands within Section 5 of Copper River Meridian 29 South 54 East, for the placement of the Land Application Disposal system and avalanche diversion berm are

necessary to support the development of the Mental Health Trust mineral estate and that no further authorization from DMLW is necessary for this development.

Please be advised that this authorization does not eliminate the potential need for authorization of your activity from other Federal, State, or local divisions or agencies.

If you have any questions regarding this request, please contact Steve Buckley at 907-269-8621

A person affected by this decision may appeal it, in accordance with 11 AAC 02. Any appeal must be received within 20 calendar days after the date of “issuance” of this decision, as defined in 11 AAC 02.040(c) and (d) and may be mailed or delivered to the Commissioner, Department of Natural Resources, 550 W. 7th Avenue, Suite 1400, Anchorage, Alaska 99501; faxed to 1-907-269-8918, or sent by electronic mail to [dnr.appeals@alaska.gov](mailto:dnr.appeals@alaska.gov). Under 11 AAC 02.030, appeals and requests for reconsideration filed under 11 AAC 02 must be accompanied by the fee established in 11 AAC 05.160(d)(1)(F), which has been set at \$200 under the provisions of 11 AAC 05.160 (a) and (b).

This decision takes effect immediately. If no appeal is filed by the appeal deadline, this decision becomes a final administrative order and decision of the department on the 31st calendar day after issuance. An eligible person must first appeal this decision in accordance with 11 AAC 02 before appealing this decision to Superior Court. A copy of 11 AAC 02 may be obtained from any regional information office of the Department of Natural Resources.

Sincerely



Steve Buckley  
Mining Section Chief

Enclosure: Copy of Constantine’s April 14, 2022 modification request

Cc via email: Allegra Cairns, Constantine  
Carolyn Curley, ADNR  
Kate Harper, ADNR  
Ben White, ADNR  
Kate Kanouse, ADF&G  
Jenny March, ADNR  
Shannon Kelly, ADNR

Hollie Chalup, MHTLO  
William Groom, DNR  
Tom Barrett, ADNR  
Tim Pilon, ADEC  
Allan Nakanishi, ADEC  
David Khan, ADEC  
Kindra Geis, ADNR